

# **EXHIBIT B**

## **(Part 10 of 10)**

regulatory body, bank, financial institution, accountant, or auditor (“United States Investigator”), any foreign government or any foreign-based regulatory body, bank, financial institution, accountant, or auditor (“Foreign Investigator”), or by the Kingdom of Saudi Arabia or any Saudi-based regulatory body, bank, financial institution, accountant, or auditor (“Saudi Investigator”), which references or addresses any of the Muwafaq Foundation’s banking and financial accounts, including any accounts held at NCB.

**ANSWER:**

31. From the period beginning January 1990 through the present, please provide all documents relating to any transactions, financial or otherwise, between You and the Muwafaq Foundation.

**ANSWER:**

32. From the period beginning January 1990 through the present, please provide all documents relating to the transfer of funds from any of Your accounts to the Muwafaq Foundation. Such accounts shall include, but are not limited to, any banking and financial accounts You hold or have held at NCB (i.e., personal account, business account, or otherwise), any NCB accounts in which You hold or have held a beneficial interest, and/or any NCB accounts over which You hold or have held signatory authority.

**ANSWER:**

33. From the period beginning January 1990 through the present, please provide all documents relating to any investigation, inquiry, review, audit, due diligence or analysis conducted by any United States Investigator, any Foreign Investigator, and/or any Saudi Investigator which references or addresses any alleged improprieties relating to the transfer of funds from any of Your accounts identified in Requests # 31-32 above.

**ANSWER:**

34. From the period beginning January 1990 through the present, please provide any and all documents governing, describing, detailing, or otherwise relating to the relationship between the Muwafaq Foundation and NCB and/or any NCB personnel.

**ANSWER:**

35. From the period beginning January 1990 through the present, please provide any and all documents relating to the role of NCB and/or any NCB personnel in the establishment, organization, funding, oversight, supervision, management, and/or control of the Muwafaq Foundation, including without limitation, appointment and termination of personnel, accounting, banking and financial transactions, fundraising, and actual distribution of financial and non-monetary support to charitable designees.

**ANSWER:**

36. From the period beginning January 1990 through the present, please provide any and all documents the Muwafaq Foundation sent to, and/or received from, NCB and/or any NCB Personnel, including without limitation, all documents relating to the transfer of NCB funds to the Muwafaq Foundation, and vice versa.

**ANSWER:**

37. From the period beginning January 1990 through the present, please provide any and all documents relating to any contributions by NCB and/or any NCB personnel to the Muwafaq Foundation, including but not limited to, monetary donations (including any monetary donations of funds originating from *haram* investments or activities), *zakat*, gifts, grants, and/or other charitable contributions. If the contribution was made by wire transfer, please provide records identifying the name of the individual who sent the money, the bank from which the money was sent, the wire transfer number, the recipient of the funds, the bank which received the wire transfer and the bank account numbers of the sender and receiver.

**ANSWER:**

38. From the period beginning January 1990 through the present, please provide any and all documents relating to any form of non-monetary support or contribution provided by NCB and/or any NCB Personnel to the Muwafaq Foundation, including but not limited to, any

administrative assistance, any assistance in obtaining identification and credentials to facilitate international travel, and any physical and logistical assets.

**ANSWER:**

39. From the period beginning January 1990 through the present, please provide all documents relating to any investigation, inquiry, review, audit, due diligence or analysis conducted by any United States Investigator, any Foreign Investigator, and/or any Saudi Investigator, which references or addresses any relationship between the Muwafaq Foundation and NCB and/or any NCB personnel, including without limitation, any investigation relating to financial transactions between the Muwafaq Foundation and NCB and/or any NCB personnel.

**ANSWER:**

40. Please provide all documents relating to any and all information or notification You and/or the Muwafaq Foundation received prior to September 11, 2001 that any individual or entity employed by and/or affiliated with the Muwafaq Foundation was associated with or involved in: (i) the sponsorship of any radical, extremist, or terrorist organization; (ii) criminal, corrupt or deviant activities; or (iii) any military, radical or terrorist activity, plot, or attack.

**ANSWER:**

41. Please provide all documents relating to any and all information or notification You and/or the Muwafaq Foundation received prior to September 11, 2001 that any individual or entity employed by and/or affiliated with the Muwafaq Foundation may have been or was engaging in conduct unrelated to the Foundation's ostensible charitable or humanitarian purposes, including without limitation, diverting funds or otherwise providing material support or resources to: (i) Islamic radicals, fundamentalists, extremists or persons or organizations associated with international terrorism or domestic terrorism; and/or (ii) al Qaida, other terrorist organizations and/or individuals sympathetic to al Qaida or other terrorist organizations, regardless of whether you believe such person(s) or entity(s) was acting within the scope of his employment in relation to any such activities.

**ANSWER:**

42. Please provide all documents relating to any and all information or notification You and/or the Muwafaq Foundation received prior to September 11, 2001 that any individual or entity employed by and/or affiliated with the Muwafaq Foundation was associated with or involved in: (i) providing funds, services, assets, medical assistance or any other form of support to mujihadeen in any part of the World; or (ii) providing financial, logistical, religious, political or any other form of assistance in relation to any armed jihad, regardless of whether such jihad was declared legitimate by competent religious authorities.

**ANSWER:**

43. Please provide any and all documents relating to the Islamic Republic of Pakistan's investigation and 1995 raid of the Muwafaq Foundation's Islamabad office and arrest of the local Muwafaq Foundation director, including without limitation, all documents relating to the subsequent closure of that office.

**ANSWER:**

44. Please provide any and all documents relating to the Federal Democratic Republic of Ethiopia's investigation and determination to close the Muwafaq Foundation's Ethiopia office in or around 1995.

**ANSWER:**

45. Please provide any and all documents relating to the Kingdom of Saudi Arabia's request that the Muwafaq Foundation cease operations, including without limitation, any documents relating to any related investigation.

**ANSWER:**

46. From the period beginning January 1990 through the present, please provide any and all documents You and/or the Muwafaq Foundation sent to, and/or received from, the Kingdom of Saudi Arabia, relating to any accusation that the Muwafaq Foundation, including any individual or entity employed by and/or affiliated with the Muwafaq Foundation, was associated with or involved in any criminal, corrupt, deviant, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

**ANSWER:**

47. From the period beginning January 1990 through the present, please provide any and all documents relating to any internal investigation conducted by You and/or the Muwafaq Foundation, relating to any accusation that the Muwafaq Foundation, including any individual or entity employed by and/or affiliated with the Muwafaq Foundation, was associated with or involved in any criminal, corrupt, deviant, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

**ANSWER:**

48. Please provide any and all documents relating to any disciplinary action taken, or any decision to terminate any relationship with any individual or entity employed by and/or affiliated with the Muwafaq Foundation as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the

support of violence or jihad, including without limitation, any such individuals or entities identified in response to Requests # 39-47 above.

**ANSWER:**

49. Please provide any and all documents relating to the disposition of all of the Muwafaq Foundation's accounts and assets held at any banking or financial institution, including NCB, following the Muwafaq Foundation's closure in or around 1996 or later.

**ANSWER:**

50. From the period beginning January 1990 through the present, please provide any and all documents relating to any business, employment, financial, charitable, religious or other relationship between You and Khalid bin Mahfouz.

**ANSWER:**

51. From the period beginning January 1990 through the present, please provide any and all documents governing, describing, detailing, or otherwise relating to the relationship between You and the National Management Consultancy Center ("NMCC").

**ANSWER:**

52. From the period beginning January 1990 through the present, please provide any and all documents governing, describing, detailing, or otherwise relating to the relationship between NCB and the National Management Consultancy Center (“NMCC”).

**ANSWER:**

53. From the period beginning January 1990 through the present, please provide any and all documents relating to Your role in establishing and implementing an Islamic Banking Division within NCB, including without limitation, developing Islamic banking products for NCB, and designing and implementing training programs for NCB.

**ANSWER:**

54. From the period beginning January 1990 through the present, please provide any and all documents governing, describing, detailing, or otherwise relating to the relationship between You and the Depositna Bank.

**ANSWER:**

55. From the period beginning January 1990 through the present, please provide any and all documents governing, describing, detailing, or otherwise relating to the relationship between Depositna Bank and the Muwafaq Foundation, the al Haramain al Masjed al Aqsa, the Saudi Joint Relief Committee for Kosovo and Chechnya, the International Islamic Relief

Organization, and the Saudi High Commission, including any subsidiary, affiliate or branch office thereof, (collectively referred to hereinafter as “Charity” or “Charities”).

**ANSWER:**

56. From the period beginning January 1990 through the present, please provide any and all documents governing, describing, detailing, or otherwise relating to the relationship between You and the Saudi Joint Relief Committee for Kosovo and Chechnya.

**ANSWER:**

57. From the period beginning January 1990 through the present, please provide any and all documents governing, describing, detailing, or otherwise relating to the relationship between You and the al Haramain al Masjed al Aqsa.

**ANSWER:**

58. From the period beginning January 1990 through the present, please provide any and all documents governing, describing, detailing, or otherwise relating to the relationship between companies owned by You, and in which You held an equity interest, and the Charities.

**ANSWER:**

59. From the period beginning January 1990 through the present, please provide any and all documents relating to all Depositna Bank accounts established in the name of, on behalf of and/or for the benefit of the Charities. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among the Charities and Depositna Bank, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

**ANSWER:**

60. From the period beginning January 1990 through the present, please provide any and all documents relating to any contributions by Depositna Bank to the Charities, including but not limited to, monetary donations (including any monetary donations of funds originating from *haram* investments or activities), *zakat*, gifts, grants, and/or other charitable contributions. If the contribution was made by wire transfer, please provide records identifying the name of the individual who sent the money, the bank from which the money was sent, the wire transfer number, the recipient of the funds, the bank which received the wire transfer and the bank account numbers of the sender and receiver.

**ANSWER:**

61. From the period beginning January 1990 through the present, please provide any and all documents relating to any form of non-monetary support or contribution provided by Depositna Bank to the Charities, including but not limited to, any administrative assistance, any assistance in obtaining identification and credentials to facilitate international travel, and any physical and logistical assets.

**ANSWER:**

62. From the period beginning January 1990 through the present, please provide any and all documents relating to any business, employment, financial, charitable, religious or other relationship between You and Chafiq Ayadi Muhammad.

**ANSWER:**

63. .From the period beginning January 1990 through the present, please provide any and all documents relating to any business, employment, financial, charitable, religious or other relationship between You and Wael Hamza Jelaidan.

**ANSWER:**

64. From the period beginning January 1990 through the present, please provide any and all documents relating to any business, employment, financial, charitable, religious or other relationship between You and Osama bin Laden.

**ANSWER:**

65. From the period beginning January 1990 through the present, please provide any and all documents relating to any business, employment, financial, charitable, religious or other relationship between You and Muhammed Salah.

**ANSWER:**

66. From the period beginning January 1990 through the present, please provide any and all documents relating to any business, employment, financial, charitable, religious or other relationship between You and Amir Mehdi.

**ANSWER:**

67. From the period beginning January 1990 through the present, please provide any and all documents relating to any business, employment, financial, charitable, religious or other relationship between You and Dr. Abdul Latif Saleh.

**ANSWER:**

68. From the period beginning January 1990 through the present, please provide any and all documents relating to any business, employment, financial, charitable, religious or other relationship between You and Talal Badkook.

**ANSWER:**

69. From the period beginning January 1990 through the present, please provide any and all documents relating to any business, employment, financial, charitable, religious or other relationship between You and Siraj el Din Bari.

**ANSWER:**

70. From the period beginning January 1990 through the present, please provide any and all documents relating to any business, employment, financial, charitable, religious or other relationship between You and Dr. Mohamed Ali El-Gari bin Eid.

**ANSWER:**

71. From the period beginning January 1990 through the present, please provide any and all documents relating to any business, employment, financial, charitable, religious or other relationship between You and Mousa Abu Marzook.

**ANSWER:**

72. From the period beginning January 1990 through the present, please provide any and all documents relating to any business, employment, financial, charitable, religious or other relationship between You and Dr. Ahmad Zaki Hammad.

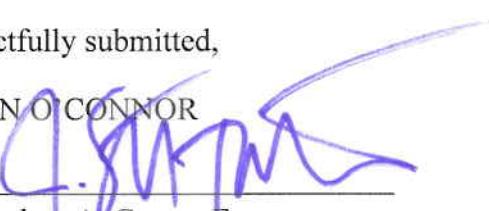
**ANSWER:**

73. From the period beginning January 1990 through the present, please provide any and all documents You sent to, and/or received from the individuals identified in Requests # 62-72, including without limitation, all documents relating to the transfer of funds between You and those individuals.

**ANSWER:**

Respectfully submitted,

COZEN O'CONNOR

By: 

Stephen A. Cozen, Esq.

Elliott R. Feldman, Esq.

Sean P. Carter, Esq.

Adam C. Bonin, Esq.

J. Scott Tarbutton, Esq.

1900 Market Street

Philadelphia, PA 19103

Tel: (215) 665-2000

Fax: (215) 665-2013

Dated: August 8, 2008

Attorneys for *Federal Insurance* Plaintiffs

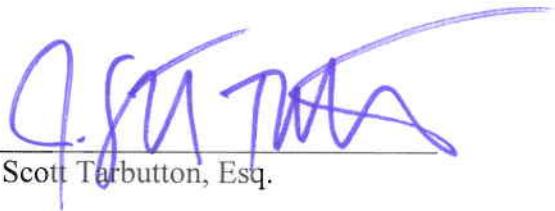
**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the *Federal Insurance* Plaintiffs' First Set of Jurisdictional Requests for Production of Documents Directed to Yassin Abdullah al Kadi was served via electronic mail and U.S. first-class mail, postage prepaid, this 8th day of August 2008, upon:

James J. McGuire, Esq.  
Sheppard, Mullin, Richter & Hampton LLP  
30 Rockefeller Plaza  
Suite 2400  
New York, NY 10112

Alan R. Kabat, Esq.  
Bernabei & Wachtel, PLLC  
1775 T Street, N.W.  
Washington, D.C. 20009-7124

(Defendants' Executive Committee's appointed representative to receive discovery requests and responses in 03-MDL-1570)



J. Scott Tarbutton, Esq.



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NCB ANNUAL REPORT

### More about NCB:

#### Founding:

- The National Commercial Bank is the most prominent of Saudi banks and was the first bank established in Saudi Arabia. The Bank initiated business in the name of ??The National Commercial Bank?? under Royal Decree on 20 Rabi Thani 1373H (26 December 1953).
- The initial paid-up capital for NCB was SR 30 million (US\$ 8 million).



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#### Legal Constitution:

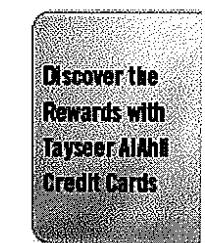
- Since its establishment, the bank has maintained its legal structure as General Partnership until it was converted into a Saudi Joint Stock Company in 1997 as a first step toward initial public offering.
- In 1999, the Government through the Ministry of Finance's Public Investment Fund (PIF) acquired a majority holding in the Bank.



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#### Management:

- With the changes in the Bank's ownership in 1999, a new Board of Directors was formed under the Chairmanship of Mr. Abdulla Salem Bahamdan who was re-elected as Chairman of the Board of Directors for the current term.
- On October 1, 2005, Mr. Abdul Kareem Abu Al Nasr was appointed as General Manager and later assumed the bank's first Chief Executive Officer (CEO) position on January 1, 2006 after NCB had applied the principles of the corporate governance to separate between ownership and management of the Bank.



#### Financial Indicators:

- The NCB is the largest Bank in terms of capital in the Arab world. The Bank's paid-up capital at year-end of 2007 is SR 15,000 million (US\$ 4,000 million).
- Total assets at year-end 2007 totaled SR 208,717 million (US\$55,658 million)

- Net profit for fiscal year 2007 totaled SR 6,038 million (US\$ 1,610 million)
- Shareholders? equity at year-end 2007 totaled SR 28,181 million (US\$ 7,515 million)
- Return on average Shareholder?s equity for fiscal year 2007 amounted to 23.1%.
- Earning per share for fiscal year 2007 amounted to SR 4.01 (US\$ 1.07).

**Key Facts & Figures:**

- The credit rating of the bank has increased to A by Fitch Agency and A+ by Standard and Poor?s.
- At year-end 2007, the Bank has operated 266 branches throughout the Kingdom, dedicated exclusively to Islamic Banking services.
- At year-end 2007, the Bank?s customers had surpassed 2 million clients.
- At year-end 2007, the Bank employees had reached a total manpower of 5412, of which 86.07% are Saudis.
- The Bank operates 1184 Automated Teller Machines and 10750 Point-of -Sale Terminals.
- The Bank operates a total of 2 international branches located in Beirut and Bahrain, and a total of 3 representative offices in London, Seoul, and Singapore.
- The Bank operates a comprehensive array of alternative delivery channels such as Al-Ahli Telephone Banking, Al-Ahli Mobile Banking, Al-Ahli Online, Alahli eCorp, Alahli ePay, Al-Ahli Tadawul, Al-Ahli International Brokerage.
- Over 85.47% of customer transactions had been successfully executed through alternative delivery channels during fiscal year 2007.
- Since the beginning of the 90?s, the Bank has been one of the pioneers in Islamic Banking, providing a wide range of innovative Islamic alternatives for various traditional services and products.
- The Bank is the biggest Financial Asset Manager in the Arab region and it is the first to offer mutual funds in the kingdom.
- The Bank has a prominent role in the area of social responsibility through executing various programs.

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